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Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MICHAEL ALLEN, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

QUICKEN LOANS INC. and
NAVISTONE, INC.,

Defendants.

Civil Action No. 2:17-cv-12352

**STIPULATION TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO
DEFENDANTS' MOTIONS TO DISMISS, AND STAYING DISCOVERY
UNTIL THE HEARING ON DEFENDANTS' MOTION TO DISMISS**

Plaintiff Michael Allen ("Plaintiff") and Defendants NaviStone, Inc. ("NaviStone") and Quicken Loans Inc. ("Quicken Loans") (together, "Defendants"), by and through their undersigned counsel, stipulate and agree as follows:

The Complaint in this lawsuit was filed on December 1, 2017. NaviStone was served with process on or around December 5, 2017 and Quicken Loans was served with process on or about December 13, 2017. Following a stipulated extension of the time of both Defendants to move or answer, so ordered by the Court, on February 2, 2018, NaviStone filed a motion to dismiss the Complaint. Thereafter, on February 9, 2018, prior to the deadline for Quicken Loans to move or answer, Plaintiff filed an Amended Complaint as a matter of course under Fed. R. Civ. P. 15(a)(1).

On February 23, 2018, Quicken Loans filed a motion to dismiss the Amended Complaint supported by a 35-page memorandum of law, and NaviStone filed a motion to dismiss the Amended Complaint supported by a 24-page memorandum of law. Per the Local Rules of this District, Plaintiff's oppositions are due on March 5, 2018.

Given the factual and legal issues presented, Plaintiff requests a 2-week extension of time to respond to Defendants' motions, from March 5, 2018 to March 19, 2018. This is Plaintiff's first request for an extension in this action, which Defendants do not oppose.

There has been one prior extension of time in this matter. On January 3, 2018, the Court granted the parties' stipulation for a roughly 5-week extension of time for Defendants to respond to Plaintiffs' complaint. *See* Dkt. No. 6.

Accordingly, the parties agree that Plaintiff's deadline to respond to Defendants' motions to dismiss should be extended to March 19, 2018, and respectfully request that this Court so order that extension. The parties have also agreed to provide Defendants with a 1-week extension for their reply briefing, such that reply briefs are due on April 2, 2018, and respectfully request that this Court so order that extension.

Lastly, for the purposes of judicial efficiency, the parties have agreed that all discovery should be stayed until the hearing, if any, on Defendants' motions to dismiss, at which time the question of whether such stay should continue may be addressed.

DATED: February 26, 2018

BURSOR & FISHER, P.A.

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IT IS SO ORDERED this _____ day of _____, 2017

Hon. Michael A. Hammer
United States Magistrate Judge